

Alcan Aluminum Corporation



100 Erieview Plaza, Cleveland, Ohio 44114
Mailing Address: P.O. Box 6977, Cleveland, Ohio 44101. Telephone: 216/523-6800

July 6, 1982

U.S. Environmental Protection Agency
Region II
Grant Administration Branch
c/o Ms. Helen S. Beggun, Chief
26 Federal Plaza
New York, New York 10007

Dear Ms. Beggun:

Pursuant to the regulations pertaining to the financial requirements of hazardous waste management, we hereby request a 90-day extension of time in which to submit evidence of insurance or any of the other acceptable means of demonstrating financial responsibility under the regulations. I certify that we have grounds to believe we meet the criteria of the financial test.

The facility to be covered by the test is operating under Permit No. NJD-065815771 and is located at:

Alcan Ingot & Powders
Division of Alcan Aluminum Corporation
901 Lehigh Avenue
Union, New Jersey 07083

Our current estimate of closure cost is \$371,275. We do not have an estimate of post-closure costs, since this is not a disposal facility.

Our most recent fiscal year ended December 31, 1981, and our year-end financial statements were audited by independent certified public accountants.

If there are any questions about this request for an extension of time, please don't hesitate to call me at (216) 523-6880. Thank you for your cooperation.

Yours very truly,

Donald G. Schurman
Vice President - Finance

DGS/em



Alcan Aluminum Corporation



100 Erieview Plaza, Cleveland, Ohio 44114
Mailing Address: P.O. Box 6977, Cleveland, Ohio 44101. Telephone: 216/523-6800

December 7, 1982

GRANTS ADMINISTRATION
REGION II
DEC 14 10 51 AM '82
ENVIRONMENTAL PROTECTION AGENCY
NEW YORK, NEW YORK

U.S. Environmental Protection Agency
Region II
Grant Administration Branch
c/o Ms. Helen S. Beggun, Chief
26 Federal Plaza
New York, New York 10007

Dear Ms. Beggun:

I am the chief financial officer of Alcan Aluminum Corporation, 100 Erieview Plaza, Cleveland, Ohio 44114. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:
 - a. EPA Identification Number: NJ D 065815771
Name:
Alcan Ingot & Powders
Division of Alcan Aluminum Corporation
Address:
901 Lehigh Avenue
Union, New Jersey 07083
Current closure cost estimate: \$105,360
Current post-closure cost estimate: None.
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the





financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

- a. EPA Identification Number: OH D 004457222

Name:

Alcan Sheet & Plate

Division of Alcan Aluminum Corporation

Address:

390 Griswold Avenue, N.E.

Warren, Ohio 44483

Current closure cost estimate: \$49,450

Current post-closure cost estimate: None.

- b. EPA Identification Number: IL D 000716860

Name:

Alcan Ingot & Powders

Division of Alcan Aluminum Corporation

Address:

Route 53 and Caton Farm Road

Joliet, Illinois 60434

Current closure cost estimate: \$89,926

Current post-closure cost estimate: None.

- c. EPA Identification Number: CA D 027909886

Name:

Alcan Ingot & Powders

Division of Alcan Aluminum Corporation

Address:

1069 Second Street

Berkeley, California 94710

Current closure cost estimate: \$371,275

Current post-closure cost estimate: None.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial



statements for the latest completed fiscal year, ended December 31, 1981.

1. Sum of current closure and post-closure cost estimates	\$ 616,011
*2. Total liabilities	257,169,000
*3. Tangible net worth	286,751,000
*4. Net worth	289,075,000
*5. Current assets	313,687,000
*6. Current liabilities	172,633,000
7. Net working capital (line 5 minus line 6)	141,054,000
*8. The sum of net income plus depreciation, depletion, and amortization	30,957,000
9. Total assets in U.S.	100%

	Yes	No
10. Is line 3 at least \$10 million?	X	
11. Is line 3 at least 6 times line 1?	X	
12. Is line 7 at least 6 times line 1?	X	
13. Are at least 90% of firm's assets located in the U.S.?	X	
14. Is line 9 at least 6 times line 1?		
15. Is line 2 divided by line 4 less than 2.0?	X	
16. Is line 8 divided by line 2 greater than 0.1?	X	
17. Is line 5 divided by line 6 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below. I request that the information in this letter be held in confidence.

Donald G. Schurman

Donald G. Schurman
Vice President - Finance
December 7, 1982

DGS/em

February 15, 1983

Ms. Vihn Cam
U.S.E.P.A.
Region II
26 Federal Plaza
New York, NY 10278

Dear Ms. Cam,

As per our phone conversation of February 14, 1983, regarding Alcan Ingot and Powders, NJD06815771 and a letter sent to them concerning non-compliance with 40 CFR Part 265.143 and 40 CFR Part 265.147, you informed me that the following are required from Alcan to comply with Part 265.147:


- a) A financial report;
- b) A letter from a CPA stating that an audit has been performed at Alcan; and
- c) A letter addressed to the Regional Administrator as per this regulation.

During our conversation, we established the fact that Alcan is in compliance with Part 265.143 except that the initial letter which was addressed to Helen Beggun may have to be readdressed to the Regional Administrator and some of the wording may need to be changed as per that Part.

As you are aware, only one page of the initial letter was sent to Alcan Ingot and Powders. Since you informed me that there should have been a second page to the letter but that it was not necessary to forward a copy to us because its contents would not apply to Alcan at this point, I have informed our client of this. As per our conversation, the second page of the letter discussed the possibility of fines up to 25,000/day if compliance was not met within twenty (20) days. Because we had made contact with you on Alcan's behalf within 20 days, you informed me that no action would be taken against Alcan as per the 20 day compliance time.

In regards to facility and generator reports for 1981, you stated that no reports were found in Alcan Ingot and Powders file. These reports were mailed to the Permit Administration Branch prior to due date by certified mail. Copies of the report and proof of their receipt is being mailed directly to you.

Sincerely,


Cynthia J. Mann
Research Analyst

CJM/jab

cc: Helen Beggun, Chief Grants Administrator
Jacqueline Schafer, Regional Administrator

SZEPATOWSKI ASSOCIATES INC

February 15, 1983

Ms. Vihn Cam
U.S.E.P.A.
Region II
26 Federal Plaza
New York, NY 10278

Dear Ms. Cam,

As per our phone conversation of February 14, 1983, regarding Alcan Ingot and Powders, NJD06815771 and a latter sent to them concerning non-compliance with 40 CFR Part 265.143 and 40 CFR Part 265.147, you informed me that the following are required from Alcan to comply with Part 265.147:

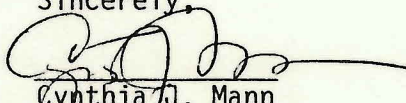
- a) A financial report;
- b) A letter from a CPA stating that an audit has been performed at Alcan; and
- c) A letter addressed to the Regional Administrator as per this regulation.

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Sincerely,


Cynthia J. Mann
Research Analyst

CJM/jab

cc: Helen Beggun, Chief Grants Administrator
Jacqueline Schafer, Regional Administrator

ENVIRONMENTAL PROTECTION
AGENCY, N.Y.
NEW YORK, N.Y.
FEB 22 12 20 PM '83
CORRESPONDENCE CONTROL
REGION II

Alcan Aluminum Corporation



100 Erieview Plaza, Cleveland, Ohio 44114
Mailing Address: P.O. Box 6977, Cleveland, Ohio 44101. Telephone: 216/523-6800

April 4, 1983

U.S. Environmental Protection Agency
Region II
Grant Administration Branch
c/o Ms. Helen S. Beggun, Chief
26 Federal Plaza
New York, New York 10007

Dear Ms. Beggun:

I am the chief financial officer of Alcan Aluminum Corporation, 100 Erieview Plaza, Cleveland, Ohio 44114. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

- a. EPA Identification Number: OH D 004457222

Name:

Alcan Sheet & Plate
Division of Alcan Aluminum Corporation

Address:

390 Griswold Avenue, N.E.
Warren, Ohio 44483

- b. EPA Identification Number: IL D 000716860

Name:

Alcan Ingot & Powders
Division of Alcan Aluminum Corporation

Address:

Route 53 and Caton Farm Road
Joliet, Illinois 60434

- c. EPA Identification Number: NJ D 065815771

Name:

Alcan Ingot & Powders
Division of Alcan Aluminum Corporation

Address:

901 Lehigh Avenue
Union, New Jersey 07083





1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: None.

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

- a. EPA Identification Number: OH D 004457222
Name:

Alcan Sheet & Plate

Division of Alcan Aluminum Corporation

Address:

390 Griswold Avenue, N.E.

Warren, Ohio 44483

Current closure cost estimate: \$52,593

Current post-closure cost estimate: None.

- b. EPA Identification Number: IL D 000716860
Name:

Alcan Ingot & Powders

Division of Alcan Aluminum Corporation

Address:

Route 53 and Caton Farm Road

Joliet, Illinois 60434

Current closure cost estimate: \$97,293

Current post-closure cost estimate: None.

- c. EPA Identification Number: NJ D 065815771
Name:

Alcan Ingot & Powders

Division of Alcan Aluminum Corporation

Address:

901 Lehigh Avenue

Union, New Jersey 07083

Current closure cost estimate: \$112,574

Current post-closure cost estimate: None.



4. The owner or operator identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This owner or operator is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on December 31. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1982.

1. Sum of current closure and post-closure cost estimates	\$	262,460
2. Amount of annual aggregate liability coverage to be demonstrated	\$	8,000,000
3. Sum of lines 1 and 2	\$	8,262,460
*4. Total liabilities	\$	223,041,000
*5. Tangible net worth	\$	305,387,000
*6. Net worth	\$	307,714,000
*7. Current assets	\$	304,286,000
*8. Current liabilities	\$	139,260,000
9. Net working capital (line 7 minus line 8)	\$	165,026,000
*10. The sum of net income plus depreciation, depletion, and amortization	\$	38,680,000
11. Total assets in U.S.		100%
	YES	NO
12. Is line 5 at least \$10 million?	X	
13. Is line 5 at least 6 times line 3?	X	
14. Is line 9 at least 6 times line 3?	X	
15. Are at least 90% of assets located in the U.S.?	X	
16. Is line 11 at least 6 times line 3?		
17. Is line 4 divided by line 6 less than 2.0?	X	
18. Is line 10 divided by line 4 greater than 0.1?	X	
19. Is line 7 divided by line 8 greater than 1.5?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151 (g) as such regulations were constituted on the date shown immediately below. I request that the information in this letter be held in confidence.

Donald G. Schurman

Donald G. Schurman
Vice President - Finance
April 4, 1983



1900 CENTRAL NATIONAL BANK BUILDING
CLEVELAND, OH 44114
216 781-3700

April 4, 1983

To the Board of Directors
and Shareholder of
Alcan Aluminum Corporation

We have examined the consolidated financial statements of Alcan Aluminum Corporation (a wholly-owned subsidiary of Aluminum Company of Canada, Limited) as of December 31, 1982 and for the year then ended and have issued our report thereon dated January 21, 1983. We have not examined any financial statements of Alcan Aluminum Corporation for any period subsequent to December 31, 1982.

We have compared the following amounts for certain financial information shown in the letter dated April 4, 1983, from Mr. Donald G. Schurman, Vice President-Finance of Alcan Aluminum Corporation, to the Regional Administrator (the "Letter") to the corresponding amounts included in the aforementioned consolidated financial statements:

<u>Description</u>	<u>Amount</u>
Total liabilities:	
Current liabilities	\$139,260,000
Long-term debt	57,372,000
Deferred income tax(long-term)	26,409,000
	<u>\$223,041,000</u>
Tangible net worth:	
Shareholder's equity	\$307,714,000
Less - Other non-current assets (primarily goodwill and patents)	<u>(2,327,000)</u>
	<u>\$305,387,000</u>
Net worth	<u>\$307,714,000</u>

<u>Description</u>	<u>Amount</u>
Current assets	<u>\$304,286,000</u>
Current liabilities	<u>\$139,260,000</u>
The sum of net income plus depreciation, depletion, and amortization:	
Net income	\$ 18,639,000
Depreciation and amortization	<u>20,041,000</u>
	<u>\$ 38,680,000</u>

We found such amounts to be in agreement. Because the foregoing procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the amounts listed above.

We performed no audit or other procedures with respect to amounts shown in the Letter for current closure and post-closure cost estimates. Accordingly, we do not express an opinion or any other form of assurance on such amounts.

This report is intended for the information of the Environmental Protection Agency and should not be used for any other purpose.

Pricewaterhouse

<u>Description</u>	<u>Amount</u>
Current assets	<u>\$304,286,000</u>
Current liabilities	<u>\$139,260,000</u>
The sum of net income plus depreciation, depletion, and amortization:	
Net income	\$ 18,639,000
Depreciation and amortization	<u>20,041,000</u>
	<u>\$ 38,680,000</u>

We found such amounts to be in agreement. Because the foregoing procedure does not constitute an examination made in accordance with generally accepted auditing standards, we do not express an opinion on any of the amounts listed above.

We performed no audit or other procedures with respect to amounts shown in the Letter for current closure and post-closure cost estimates. Accordingly, we do not express an opinion or any other form of assurance on such amounts.

This report is intended for the information of the Environmental Protection Agency and should not be used for any other purpose.

Pricewaterhouse